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RECEIVED  
JUL 27 2008  
BY: UB

Attorney for Defendants

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF ALASKA AT FAIRBANKS

ROBERT PROBERT and LORETTA E. )  
PROBERT, and others similarly situated, )

Plaintiffs, )

vs. )

FAMILY CENTERED SERVICES OF )  
ALASKA, INC. )

Defendant. )

Case No.: 4:07-CV-00030 RRB

**RESPONSES TO PLAINTIFFS' DISCOVERY REQUESTS OF 3/19/2008**

COMES NOW the Defendant Family Centered Services of Alaska, Inc., by and through their attorney, John Foster Wallace of McConahy, Zimmerman & Wallace, and answers Plaintiffs' Discovery Requests of March 19, 2008.

**REQUEST FOR PRODUCTION NO. 1:** Please produce any and all Personnel Action Forms for Robert & Loretta Probert, Donna & John Grimes and Gene & Sandra Grissom.

**RESPONSE:** Please see documents bates numbered FCSOA-00420 through FCSOA-00450.

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**REQUEST FOR PRODUCTION NO. 2:** Please produce any and all Client Rehabilitation Service Notes (Med Notes) filled out by Robert & Loretta Probert, Donna & John Grimes and Gene & Sandra Grissom.

**RESPONSE:** Family Centered Services of Alaska, Inc. objects to this request on the grounds that it is overly burdensome and requests information that cannot be released without the express consent of the clients and/or the parents or their guardians. The specific Client Rehabilitation Services Notes are kept in a part of each client's file. In order to provide the requested documents, Family Centered Services of Alaska, Inc. would have to obtain every client's file and remove the individual notes. Additionally and more importantly, the documents cannot be released without explicit permission from each client and/or their guardian. A redacted Client Rehabilitation Service Note is attached for illustrative purposes and identified as bates numbers FCSOA-01064 and FCSOA-01065. Without waiving the above objection, Family Centered Services of Alaska, Inc. also provides the billing history for each plaintiff identified as bates number FCSOA-00451 through FCSOA-00602. If after review of the redacted services notes and billing information, there is additional information sought by the Plaintiffs that can be provided without disclosing the specific service notes, Family Centered Services of Alaska, Inc. will consider additional requests and see if the requested information can be obtained from the computer database. Please note that the client's names have been redacted from the documents provided in response to this request.

**REQUEST FOR PRODUCTION NO. 3:** Please produce any and all Medicaid billings sent in based on information provided by Robert & Loretta Probert, Donna & John Grimes and Gene & Sandra Grissom.